

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION

In re:

RICHARD PATRICK MONAHAN and
KRISTIN MOORE MONAHAN,

Debtors.

Case No. 5:19-51575-SJS

Chapter 13

**PHC INDUSTRIAL, LLC'S
OBJECTION TO PLAN CONFIRMATION**

Creditor PHC Industrial, LLC ("PHCI"), through counsel, hereby joins the Trustee's Objection [D.E. 26] to confirmation of the Chapter 13 plan of Debtors [D.E. 16] (the "Plan") in accordance with Rule 3015 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 3015(E).

In supporting the Trustee's Objection to Plan Confirmation, PHCI expressly reserves and does not waive its right to object to discharge of the Consent Judgment attached to PHCI's proof of claim (*see* Claims Register 21) under Section 532(a)(2), (4), or (6) of the Code, based on the conduct set forth in the Consent Judgment. PHCI will file its objection to discharge within the deadline set forth in the Notice of Chapter 13 Bankruptcy Case [D.E. 7].

WHEREFORE, PHCI prays the Court enter an Order denying confirmation of the Plan.

NOTICE OF HEARING

PLEASE TAKE NOTICE that a **HEARING** on the foregoing Objection to Plan Confirmation will occur on **Friday, January 10, 2020 at 10:00 am** in the United States

Bankruptcy Court for the Eastern District of Virginia, Newport News Division, 2400 West Avenue, Newport News, Virginia.

Respectfully submitted this the 3rd day of January, 2020.

/s/ John S. Buford

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served on all parties to this action by electronically filing the same with the Clerk of Court using the CM/ECF system and/or by depositing a copy of the same in the United States Mail, first-class postage prepaid, addressed as follows:

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This the 3rd day of January, 2020.

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